

IN THE UNITED STATES DISTRICT
COURT FOR THE EASTERN DISTRICT OF MICHIGAN

FORD MOTOR COMPANY, a Delaware corporation, JAGUAR CARS, LTD., a United Kingdom company, ASTON MARTIN LAGONDA, LTD, a United Kingdom company, VOLVO TRADEMARK HOLDING AB, a corporation organized under the laws of Sweden,

Plaintiffs,

vs.

Civil No 00-71544

HON. GERALD ROSEN

GREATDOMAINS.COM, INC., a California corporation, Robert E. Capps, registrant of JAGUARSALES.COM, Roger Hoe, registrant of JAGUARSERVICING.COM, Victor B. Tucker, registrant of JAGUAR-F1-RACING.COM, Mahan Consulting, registrant of JAGUARITEMS.COM, VOLVOITEMS.COM, FORDITEMS.COM, LINCOLNITEMS.COM, MERCURYITEMS.COM, Zykar Intl., registrant of JAGUARMOTORCOMPANY.COM, Gapmount Limited, registrant of JAGUARCENTER.COM, Paul A. Brown, registrant of JAGUARENTHUSIASTSCLUB.COM, Allegiance, registrant of JAGUARBUYER.COM, PIW Corp., registrant of 1800JAG.COM, FORDSUV.COM, LINCOLNSUV.COM, 1800FORDTRUCK.COM, Pavin Jacob, registrant of 4AVOLVO.COM, 4AJAGUAR.com, 4AJAG.COM, 4AJAG.COM, Maksim Muzichenko,

U.S.
EAST
DISTRICT
COURT
MICH.
DETROIT
00, NOV 24 PM '00

ANSWER TO COMPLAINT

HS

registrant of JAGUARSHOWROOMS.COM,
FORDSHOW.COM,
FORDSHOWROOMS.COM,
LINCOLNSHOWROOMS.COM,
Anton Muzichenko, registrant of
VOLVOSHOWROOM.COM,
VOLVOSHOWROOMS.COM,
VOLVOSHOW.COM, Joseph Parvin, registrant
of EJAGS.COM, Levy Investco, registrant of
DRIVEVOLVOS.COM, DRIVEFORDS.COM,
DRIVEJAGUAR.COM,
DRIVEJAGUARS.COM,
DRIVELINCOLN.COM, Local Websites,
registrant of FORDREPAIRS.COM,
VOLVOREPAIRS.COM, Thompson, Tinn and
Associates, registrant of VOLVOCREDIT.COM,
Eric Yen, registrant of FORDTODAY.COM,
VOLVOCENTER.COM, VOLVO4U.com,
Roger Abramson, registrant of
VOLVOSFORSALE.COM,
VOLVOS4SALE.COM, LINCOLNS4SALE.COM,
Hans Rekestad Enterprises, registrant of
CLASSICVOLVO.COM, Specialized Auto,
registrant of VOLVOGUY.COM, Thomas Cooper,
registrant of VINTAGEVOLVOS.COM,
Craig Melquist, registrant of VOLVOSAFETY.COM,
Hurricane Ind., registrant of
TEXANLINCOLNMERCURY.COM,
TEXANFORD.COM, TEXANSFORD.COM,
TEXANFORD.NET, TEXANFORD.ORG,
BuyDirect Products, Inc., registrant of
LINCOLNMERCURYREDCARPETLEASE.COM,
Cibertisement, registrant of
FORDFACTORYPARTS.COM, JDT, Inc., registrant of
TEXASFORDTRUCKS.COM, Domain for Sale,
registrant of VOLFORD.COM, Zero Games, registrant
of PREOWNEDMUSTANG.COM, Dewey Swain,
registrant of THE-FORD-MOTOR-COMPANY.COM,
Joseph Davidovic, registrant of

FORDYOUNGDRIVERS.COM,
FORDYOUNGDRIVERS.NET,
FORDYOUNGDRIVERS.ORG, Vaneechoud, registrant
of FORDRENTING.COM, Julie Webb, registrant of
FORDPICKUPSALES.COM, Rich O'Reilly, registrant
of FORDCHEVY.COM,
FORDCHEVYRACING.COM, Greg Kays, registrant
of FORD-JAGUAR.COM, Mainstream Music,
registrant of FORDV8.COM, JonLR, registrant of
FORDCARE.COM, Saket Narula, registrant of
FORDTELEMATICS.COM, Radtech, registrant
of 4FORDPARTS.COM, 4FORDTRUCKS.COM,
Jimmy McClaren, registrant of
RUSTYWALLACEFORD.COM, Mustang Market,
registrant of FORDBODYPARTS.COM,
Grahamwallbank, registrant of FORDIY.COM,
HorizonStar Communications, registrant of
FORDTRUCKNEWS.COM,
Ford Sucks and Everyone Knows It, registrant of
FORDSUCKS.COM, Date Productions, registrant
of FORDMOTOR.NET, J. Denosky, registrant of
FORD-AUTOS.COM, Suman Saini, registrant of
FORD-DEALER.COM, UsFour, Inc., registrant of
FORDINDIA.COM, Royalyork/namesforsale,
registrant of FORDAUTOSALES.COM,
Montgomery, registrant of FORDMOTORCARS.COM,
Diego Decal, registrant of FORDUS.COM,
Suzanne Singleton, registrant of
JUSTFORDS.COM, JUSTFORDS.NET,
Market Links, registrant of 1STFORD.com,
www.BYORLEASEDOMAINS.com, registrant of
HAVEUDRIVENAFORDLATELY.COM,
Fordmustang.com, registrant of
FORDMUSTANG.COM, Onlyne Corporate Services,
registrant of FORDPROBE.COM,
Internet Development Corp., registrant of
FORDHEADQUARTERS.COM, FORDDEALS.COM,
FORDCENTRAL.COM, Chander Radhakrishnan,
registrant of FORDVOLVO.COM, Rubuscum Oy,

registrant of FORDCENTER.COM,
Mr for Sale, registrant of FORDING.COM,
Ran Productions, registrant of FORDVISION.COM,
Jose F. Martinez, registrant of FORDAP.COM,
IFORDPARTS.COM, Kevin Saucier, registrant
of IFORDS.COM, Seller, registrant of
SHOPNFORD.COM, Tom Borysiak, registrant of
WIN-A-FORD.COM, WIN-A-MUSTANG.COM,
Dreamsites, registrant of GAYLORDFORD.COM,
Scott Howell, registrant of OLDFORDS.COM,
Your Best Price (.com), registrant of
FORDBRONCOS.COM, Mr. Richard G. Shanks,
registrant of FORD2001.NET,
Vine-Overseas Trading Corp., registrant of
FORDHOLDINGS.COM, Cromwell Business
Systems Ltd., registrant of FORDS.CO.UK,
John Doe, registrant of FORDS.TO, Ian Bailey,
registrant of FORDBANK.CO.UK,
AAFM Breukers, registrant of
FORDGARAGE.COM, John Murphy,
registrant of MRASTONMARTIN.COM,
Phillip Barry a/c LLB, registrant of
DB7ASTON-MARTIN.COM, EIDC, registrant of
MUSTANGMUSCLE.COM,
Domain for Sale by ACE, registrant of
57TBIRD.COM, Cheers and Tears Custom Designs,
registrant of PREMIERAUTOMOTIVEGROUP.COM,
Dotcoms2sell, registrant of TAURUSRACING.COM,
Diamond Star Marketing Inc., registrant of
STANGSTUFF.COM, Auction 1 Online, registrant of
STANGAUCTIONS.COM, Spencer Associates,
registrant of MERCURYSOURCE.COM, Chuck,
registrant of MERCURYS.COM, Alfonso Fiero,
registrant of LINCOLNTRUCKS.COM, and
Hazel Matthews, registrant of S-TYPEGO.COM,

Defendants

JURISDICTION AND VENUE

Paragraph 7. I have no knowledge of the information.

Paragraph 8. I deny the statement.

Paragraph 9. I have no knowledge of the information.

Paragraph 10. I am without information sufficient to form a belief.

Paragraphs 11-90 I have no knowledge of the information.

Paragraph 91. I agree with the statement.

Paragraphs 92-95 I have no knowledge of the information.

Paragraph 96. I have no knowledge of the information.

Paragraph 97. I have no knowledge of the information.

Paragraph 98. I deny the statement.

Paragraph 99. I am without information sufficient to form a belief.

Paragraph 100. I agree with the information.

Paragraph 101. I agree with the information.

Paragraph 102. I agree with the information.

Paragraph 103. I have no knowledge of the information.

Paragraph 104. I have no knowledge of the information.

Paragraph 105. I agree with the statement.

Paragraph 106. I am without information sufficient to form a belief.

Paragraph 107. I am without information sufficient to form a belief.

Paragraph 108. I agree with the statement except for the last line. I am without information sufficient to form a belief regarding the statement "Thus, Great Domains.com shares its customers' interest in selling their domain names at the highest possible price."

Paragraph 109. I deny the statement.

Paragraph 110. I deny the statement.

Paragraph 111. I deny the statement.

Paragraph 112. I am without information sufficient to form a belief.

Paragraph 113. I deny the statement.

Paragraph 114. I deny the statement.

Paragraph 115. I deny the statement.

FIRST CLAIM FOR RELIEF
(Cyberpiracy)

Paragraph 116. I deny the statement.

Paragraph 117. I deny the statement.

Paragraph 118. I deny the statement.

Paragraph 119. I deny the statement.

Paragraph 120. I deny the statement.

SECOND CLAIM FOR RELIEF
(Trademark Dilution)

Paragraph 121. I deny the statement.

Paragraph 122. I deny the statement.

Paragraph 123. I deny the statement.

Paragraph 124. I deny the statement.

THIRD CLAIM FOR RELIEF
(Trademark Infringement)

Paragraph 125. I deny the statement.

Paragraph 126. I deny the statement.

Paragraph 127. I deny the statement.

Paragraph 128. I deny the statement.

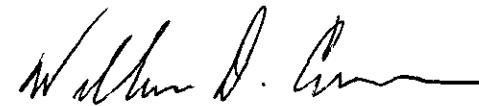
Paragraph 129. I deny the statement.

FOURTH CLAIM FOR RELIEF
(False Designation of Origin)

Paragraph 130. I deny the statement.

Paragraph 131. I deny the statement.

Paragraph 132. I deny the statement. Wherefore, Defendant respectfully requests that Plaintiffs take nothing by their complaint. I also respectfully request that I be awarded my attorney fees and costs of suit under 15 U.S.C. 1117(a) and 35 U.S.C. 285; and that I be awarded such other relief as the Court may deem just and proper.



William D. Escue, PRO SE
Auction 1 Online
2404 Mockingbird Lane
Ponca City, OK 74604
(580)-718-1450
Defendant

DATED 14 October, 2000

I, William D. Escue, hereby certify that I mailed a true copy and correct copy of the foregoing answer to Plaintiff's Attorney, Kathleen Lang, Dickinson Wright PLLC, 500 Woodward Avenue, Suite 4000, Detroit, MI, 48226-3425.

*Jennifer Sattler
Notary Public*

*My commission expires:
10/18/03*